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BEYOND

Good Intentions



STEPS TO CRAFT EQUITY-DRIVEN POLICY

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AMERICA

USC Race and
Equity Center

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MEETING STATE GOALS

For too many students, access to higher education does not automatically lead to equal opportunity or successful outcomes. Longstanding structures in higher education are built on inequality and pose barriers that exclude these students, preventing them from completing college.

This reality has a direct impact upon states' abilities to meet their workforce and economic goals, as well as being a moral and social justice issue. States must be willing to change the status quo to remain competitive in the future and fill workforce demands with a diverse, engaged, educated citizenry. To meet their goals, states must improve completion rates among students who have experienced racial, economic, and other forms of inequity, such as BILPOC students, students from under-resourced families, adult learners, students who are the first in their family to attend college, rural students, veterans, students with disabilities, students who were in the foster care system, and/or students experiencing homelessness, among others. (BILPOC students are those who identify as Black, Indigenous, Latinx, and/or People of Color.)

Meeting these goals means that states must go beyond good intentions to craft equity-driven policies that are specific, actionable, measurable, and well funded. Complete College America (CCA) is a national leader in working with federal and state policymakers to create legislation that supports increasing completion rates while closing institutional performance gaps. We developed this resource to provide action steps and tips for crafting equity-driven policies that will lead to transformational change at colleges and universities as well as support state goals.

This report builds on findings from *Race-Conscious Implementation of a Developmental Education Reform in California Community Colleges*, a companion report by the University of Southern California (USC) Race and Equity Center. The USC report takes a closer look at California's landmark Assembly Bill (AB) 705 and how implicitly or explicitly writing a policy in a race-conscious manner matters during implementation on college campuses. For more on AB 705, see page 5. To download the report, go to <https://www.racialequityforccc.com>.

SHIFTING to an Equity Approach

Equality and equity are not the same. Equality means providing every student the same resources and support, no matter their background or level of preparation.

Equity means providing individual students the specific resources and services they need so that all students can achieve the same, or equitable, outcomes.



To take an example outside of education, if you were holding an in-person business meeting in Chicago and you wanted employees from across the country to attend, you would not give them each \$250 for travel because the costs to attend for those living in Chicago, Indianapolis, Las Vegas, and rural Alabama are different. Simply providing equal inputs—the same money for transportation costs—is not enough to meet the goal. The inputs must be adjusted based on the circumstances of each participant; some will have higher transportation costs than others, and some may face additional challenges, such as not having a reliable car to get to the airport or needing to arrange for child care. When the goal is to increase college completion to meet the needs of the state, the approach must be equity driven based on the circumstances of the students.

Ensuring more equitable outcomes starts with institutions shifting their mindsets from seeing student deficits as the cause of institutional performance gaps to focusing on institutional policies and practices that can provide every student the support they need to succeed—ultimately closing those gaps. Higher education already provides specialized systems and structures to accommodate the needs of specific groups of students. For example, just as universities design executive master of business administration degree programs to accommodate working professionals by offering night and weekend classes, often in hybrid or online formats and with shorter overall program lengths, this type of creative solution can be developed with equity in mind. The City University of New York's Accelerated Study in Associate Programs (ASAP) predominantly serves students from under-resourced families and works to combat disparities in earning and credentials for BILPOC New York City residents. The customization associated with this program has significantly increased the three-year graduation rate for ASAP students by providing academic, social, and financial supports including individualized course schedules, full-time enrollment, comprehensive and personalized academic and career advisement, scholarships for tuition and fees, support for textbook costs, and unlimited MetroCards.

CCA's *No Middle Ground: Advancing Equity Through Practice* demonstrates how colleges can assess practices to identify inequities and address them through proven strategies that are essential for student-centered higher education systems. Download the report at <https://completecollege.org/resource/NoMiddleGround>.

Beyond Good Intentions focuses on how to develop equity-centered policies that enable colleges and universities to effectively design, fund, and scale programs that will ensure that higher education systems and structures meet the needs of the students they serve.





CLARIFYING LANGUAGE

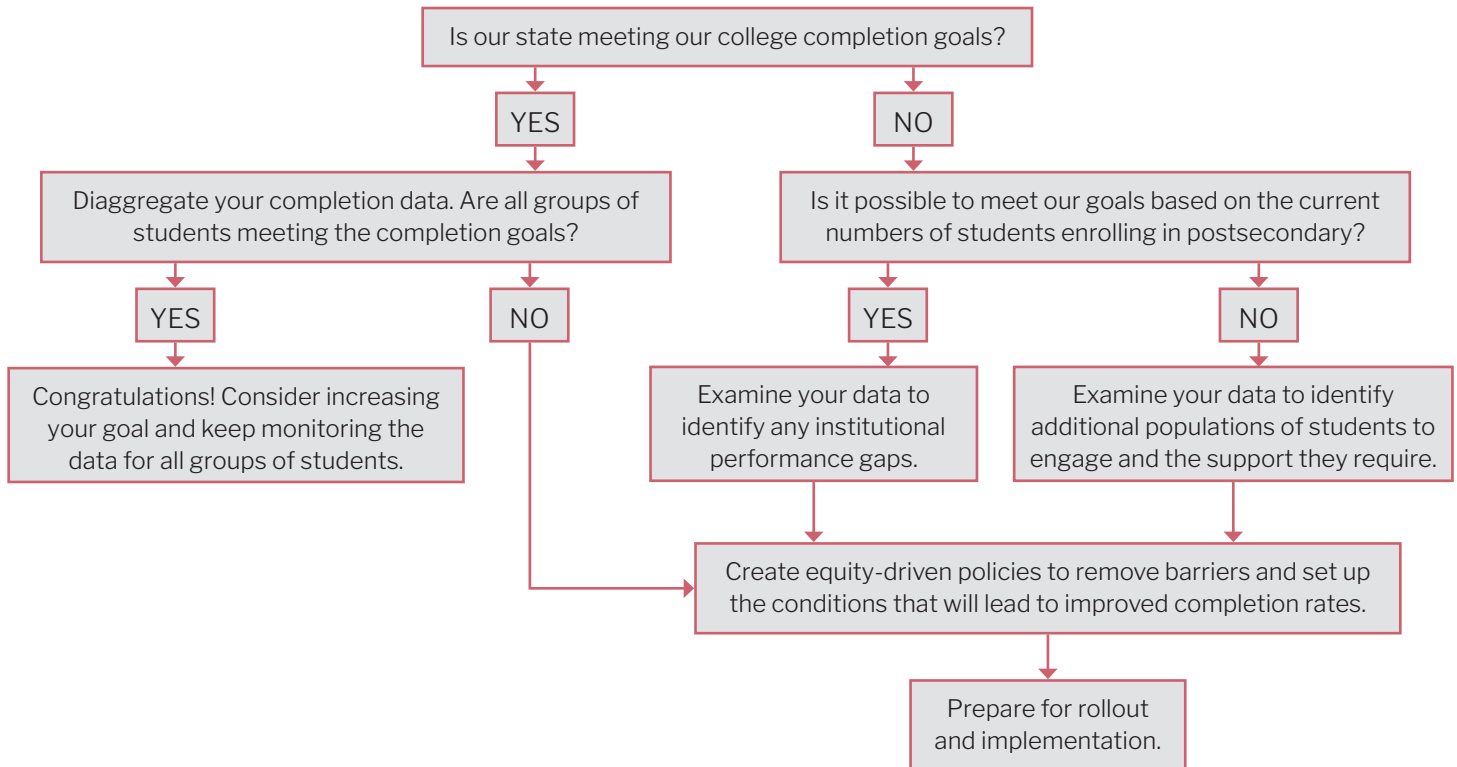
In discussing the people affected by racial inequity in education, CCA aims to choose words that underscore essential ideas, acknowledge the people affected by inequity, and are clear and consistent across our communications.

We use the following terms in this report:

- **BILPOC (Black, Indigenous, Latinx, People of Color).** CCA chose this term in the context of its work on educational attainment. Using CCA's metric of college completion, the data shows consistent institutional performance gaps for Black, Indigenous, and Latinx students.
- **Historically excluded/historically under-represented/historically underserved.** All of these terms refer to groups that have been denied access to resources (e.g., education and health care) as a result of institutional racism. In the past, CCA used the word *marginalized* in this context. CCA uses the term *historically excluded* now because it most accurately describes the cause of institutional performance gaps. The term *racially minoritized* underscores the fact that *minority groups* is a designation created by those in power so certain groups could be marginalized or excluded.
- **Students from under-resourced communities.** CCA uses this term instead of *low-income students* or *students from low-income communities* to emphasize the many barriers that income inequality creates for students.
- **Students from under-resourced families.** In college data, Pell Grant status is a proxy for family income, which typically correlates with completion rates. CCA says *students from under-resourced families* instead of *low-income students* or *students from low-income families*. We use this term because we recognize that family income also correlates with access to food, health care, technology, and other resources that affect students' ability to succeed.
- **Institutional performance gaps.** These are gaps among student groups in completion rates and other outcomes. This term puts the focus on the institutional barriers that are the root causes of inequities, whereas the term *equity gaps* implies that students are the cause of (and/or are responsible for changing) gaps in performance and completion.

DO YOU NEED NEW POLICY to Meet Your Postsecondary Completion Goals?

Before states start to develop policies to make progress toward their college completion goals, they must assess where they stand in terms of current attainment trends, which will determine next steps:



The following sections provide steps, tips, and examples to guide policy development and ensure that all students in your state, particularly those who have been historically excluded, can complete college—and that your state has the educated citizenry it needs to meet workforce and economic goals.



SETTING GOALS FOR SPECIFIC STUDENT GROUPS

To meet its equity goals, **Colorado** aims to raise its postsecondary completion rate to 66 percent not only statewide but also for every racial and ethnic student group by 2025. In 2017, the overall statewide attainment rate was 57 percent, but a closer look revealed that the attainment rate for Latinx and Native American adults was 23 percent and for Black adults it was 38 percent. These groups are more than a quarter of Colorado’s population, so disaggregating the data provided the state a clear understanding of where it has opportunities to move the needle on its completion goals. It also is developing focused interventions to assist the identified populations and close institutional performance gaps.



EQUITY-DRIVEN POLICY IN ACTION

California's AB 705

In California, as in many states around the nation, a large percentage of students who are placed in prerequisite remediation do not go on to complete college for a variety of reasons, including the additional time and cost of these non-credit-bearing courses. The students placed in prerequisite remediation are disproportionately Black, Latinx, Indigenous, or Southeast Asian. California sought to address this situation with AB 705, which set out to “maximize the probability that a student will complete transfer-level coursework in English and mathematics within a one-year timeframe.”



A [USC Race and Equity Center analysis](#) of AB 705 makes clear that no matter the intent of the policy, how it is developed, written, and rolled out has significant implications for how it is implemented on college

campuses and whether it will have its intended effect. The steps outlined in this guide build on these findings.

Race-Conscious Intent in AB 705

The introductory text of AB 705 emphasizes why it is needed, citing that “California’s community colleges identify more than 75 percent of its students as underprepared, and refer this overwhelming majority of students to remedial courses.” It also specifies that “just 40 percent [of students placed in remediation] go on to complete a degree, certificate, or transfer outcome in six years, compared to 70 percent for students allowed to enroll directly in college-level courses.”

The introductory text further highlights that placement in remediation has “serious implications for equity, since students of color are more likely to be placed into remedial courses.” It also states that the “Board of Governors has established rules to protect students from being excluded from courses in which they can be successful ... in response to a Mexican American Legal Defense and Education Fund lawsuit that ... was driven by concerns that assessment tests disproportionately placed Latino students into remedial prerequisite courses.” Beyond those two mentions of race, however, the law does not include mention of specific student groups in the actions it requires, expected outcomes, and accountability measures.

Implementation of the Policy

The USC Race and Equity Center analysis looked at the implementation of AB 705 in two community colleges that were considered strong implementers of the bill. But even in those two schools, the study found that “implementation varied greatly across English and math departments.” It further found that “AB 705 did not have sufficient structures and guardrails to ensure that implementation would be guided by an awareness of its potential to advance the racial equity goals envisioned in the [state] strategic plan.” Among the guardrails that the policy did not include was a mandate that colleges eliminate prerequisite remediation, although it did encourage them to offer corequisite support.

In the study, “interviewees repeatedly referenced the policy text when sharing their view of AB 705. They sometimes cited the policy verbatim, named specific webinars and guidance memos, and presentations by system officials at conferences when explaining the aspirational goals of developmental reform. This is important because *it influenced what leaders believed was mandatory and possible under AB 705.*”

Results to Date and Next Steps

Although data shows that every group of students has higher completion rates since AB 705 was enacted, some colleges are seeing larger gaps between groups. Another study by the [California Acceleration Project](#) showed that in fall 2020, almost three years after AB 705 was enacted, Black and Latinx students disproportionately attended colleges that have maintained large remedial math offerings, and colleges serving more than 2,000 Black students were more than twice as likely to be weak implementers of AB 705 as other colleges.

This willingness to examine the impact of the policy and acknowledge that it is not having its intended impact for all students is leading to potential changes. In response to the data analysis and research, new proposed legislation known as AB 1705 is seeking to remedy the inequitable implementation of the original policy. It is also seeking to close loopholes that allow colleges to continue to enroll students in remedial courses, even if the colleges do not have sufficient evidence to prove that remediation is effective.





CRAFTING EQUITY-DRIVEN POLICY

Lessons learned from states such as California that are implementing equity-driven policies reveal a set of steps and best practices for how to craft those policies to achieve the intended effect.

STEP

1

Examine the Data to Set the Goal for Your Policy

Policies that go beyond good intentions to drive consistent, successful outcomes are grounded in data. Start by using resources such as the National Student Clearinghouse Postsecondary Data Partnership to collect data and understand which students are enrolling in but not completing college. Then identify barriers that are standing in their way and set goals for an equity-driven policy. Steps to take include:

- Disaggregate enrollment and completion data to identify student groups that are not getting to college or are enrolling in but not completing college at disproportionate rates. Examine by:
 - » Race, ethnicity, gender, age, socioeconomic level, geographic area, part-time/full-time status, first generation in college, foster youth, veteran, and formerly incarcerated.
- Look at a wide variety of metrics for each group, including:
 - » Enrollment, term-to-term and year-to-year retention, completion of college-level English and math courses in the first year, credit accumulation, number of excess credits, timing of major choice, part-time/full-time status over time, use of credit for prior learning, dual enrollment, and time to completion.
- Compare the data for each group to the statewide goal, rather than to the group that currently has the highest completion rate. For example, if your state has a goal for 65 percent of adults to have a postsecondary degree, look at how Black, Latinx, Indigenous, Asian, and White students are doing compared to that goal, rather than to one another.
- Using these results from the data analysis, identify the goal for your policy—specifically, the inequity your policy will address and the student groups it will affect.

Determine Policy Recommendations

Once your state has an overarching goal for its equity-driven policy, consulting a range of stakeholders and examining potential strategies to meet that goal are important to ensure consistent implementation and outcomes resulting from the policy. Steps to take include:

Convene a task force

- Establish a cross-sector task force to develop recommendations for specific requirements and guidance to include in the policy. To support the work of the task force:
 - » Provide an explicit charge for the work.
 - Require the task force to provide recommendations for policies and practices that are linked to the goal for the policy.
 - Make sure that equity is defined and made a specific goal for the task force.
 - » Name specific members of the task force.
 - Include faculty and staff who have the most contact with the student groups identified in Step 1.
 - Include students from the identified groups as well as representatives from the two-year and four-year college systems, K-12, the workforce, and other relevant sectors or organizations.
 - Ensure that those informing the policy include people whose lived experiences match those of the identified student groups. For example, if your policy is focused on racial equity, include the voices of the racial groups being addressed. If it is focused on adult learners, include those who started and/or completed college as adults.
 - » Specify a timeline for the task force to complete its work.
 - » Develop a plan for disseminating the task force’s findings and recommendations.



When considering policy to require corequisite support, the **Nevada** System of Higher Education produced a detailed [report](#) on the performance of the state’s existing system of traditional remediation. The report showed that too often Nevada colleges and universities were placing students—especially BILPOC students and students from under-resourced families—into remedial courses and that remediation hinders degree completion. The review of this data and subsequent math pathways laid the groundwork for the Nevada System of Higher Education’s recommendation for “sweeping policy revisions” to shift to corequisite support.

Examine strategies, supports, and funding

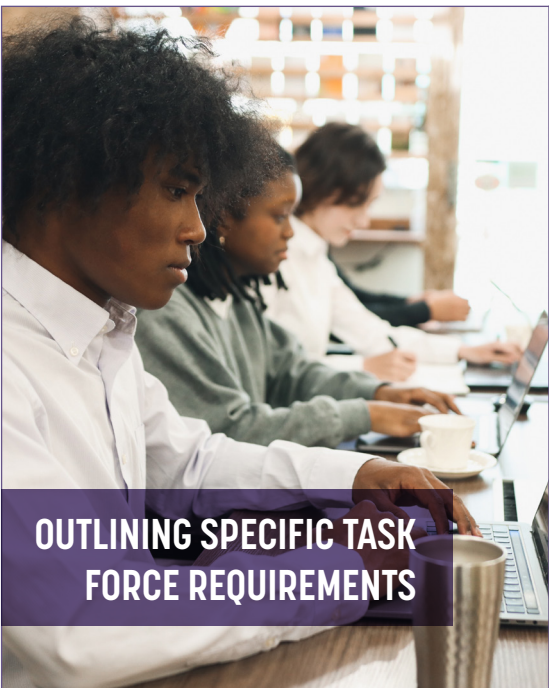
- Identify strategies that are proven to work.
 - » Think about policies that not only affect specific student groups but, when implemented at scale, also affect systems, structures, institutional culture, or foundational ways colleges and universities operate. (For more on strategies that lead to transformational change, see <https://completecollege.org/strategies/>.)
 - If boutique programs that benefit only a small number of students achieve good results, learn about why the programs are working. Then identify the resources needed to make these programs the norm for all students since change at the margins yields only marginal change.
 - » Go beyond systems and structures to include pedagogical solutions that happen inside the classroom.
 - » Combine CCA strategies whenever applicable. For example, dual enrollment can be combined with corequisite support to smooth the transition from high school to college and ensure that students, regardless of background, have access to and complete gateway college-level courses in English and math, in turn increasing the chances that they will go on to complete college.
- Determine explicit supports stakeholders need to ensure consistent, effective implementation of the policy.
 - » Postsecondary leaders need to be empowered and assured of support so they can be bold when they develop plans to implement the policy and meet associated goals.
 - » Faculty need professional development and training to implement the policy with fidelity to equity.
 - » Students need to be incorporated in innovative ways not only in planning/decisionmaking related to the policy but also throughout its implementation to ensure relevancy.
- Leverage the collective expertise and lived experiences of the task force members to identify possible unintended consequences for students in the groups specified in the policy. For example, in its policy on credit for prior learning, Louisiana capped the fee for evaluating and transcribing prior learning at the equivalent of tuition for one credit hour to avoid undue financial burden on students. The policy also spelled out that veterans and active military personnel would not be charged at all for these services.
- Determine how the work recommended by the task force will be funded.
 - » Explore adequacy funding to match the level of resources provided to the level of need at each institution. Institutions that serve more students in the identified groups should receive more funding than institutions that serve fewer of those students. (For more on adequacy funding, see p. 10.)
 - » Itemize the resources required to implement the policy and divide them into one-time funding needs versus ongoing support to ensure sustainability.



UNDERSTANDING ADEQUACY FUNDING

The institutions that serve the students with the most need often receive the same—or even less—funding than those whose students have less need. For example, two-year colleges often receive less funding per student than their four-year counterparts, and rural colleges often receive less than colleges located in a city.

Adequacy funding seeks to make the resources provided align with institutional performance gaps. In other words, a historically underfunded community college serving BILPOC students from under-resourced communities often needs more resources to effect change and close those gaps than a flagship four-year college serving primarily wealthier, White students.



OUTLINING SPECIFIC TASK FORCE REQUIREMENTS

The [2021 bill](#) that created **Oregon's** Task Force on Student Success for Underrepresented Students in Higher Education not only provides a specific charge for the task force but also identifies the student groups it is designed to benefit. The bill specifies that under-represented students include those who are from rural communities in the state; are from low-income families; experience disability, including intellectual developmental disabilities; identify as lesbian, gay, bisexual, transgender, queer, two-spirit, intersex, asexual, nonbinary, or another minority gender identity or sexual orientation; are undocumented; and have been a foster child. Further, the task force is explicitly required to visit current, prospective, and former students from each of these groups at the state's public postsecondary institutions to help develop student success and funding proposals that address access, retention, graduation, and entry into the workforce.

Craft the Policy

States, systems, and individual colleges and universities often do the necessary research to plan their policy, only to then craft policy that lacks specificity and thus is hard to enforce and use to drive change. To ensure that your policy is implemented consistently and will lead to successful outcomes, it must be specific, actionable, measurable, and well funded. Equity-driven policies should therefore include details about:

Why this policy is being developed and whom it affects

- State the purpose and goals for the policy clearly and explain how the purpose and goals will support your state in reaching its overall completion and equity goals.
- Use current and historical data to explain the urgent need for the policy and overcome any potential wariness about policymaker aims.
- Use bold, clear language to say what you mean.
- Be specific about the inequity the policy is designed to address and the student groups that will be affected. Do not use generic language. For example, if your policy is designed to address racial inequities, name the student groups that are not being served or have been historically excluded from higher education. Name the identified student groups in the description of the intent of the policy and when describing the programs or structures being developed or modified, the goals of the policy, and how the results will be measured.
 - » A policy in Colorado, for example, spells out that Native American students will pay in-state tuition at state colleges and universities, even if they do not live in Colorado, because many of them “have been forced to relocate across state lines, far from their historical home places”; college enrollment rates for Native Americans were the lowest of all race and ethnicity groups surveyed; and poverty rates were higher for Native Americans than any group surveyed.



What the policy requires and how it will be funded

- Define specific actions that are connected to specific populations but ultimately will benefit all students.
 - » Consider the opposite concept of a rising tide lifts all boats. While a generic solution that aims to benefit all students may lift all boats, it also may not address the causes of the inequities, leaving any gaps unchanged. However, a well-defined solution for a specific population often can be structured to support all students. For example, replacing prerequisite remediation with corequisite support is an equity strategy because students placed in prerequisite remediation often do not complete college-level coursework, and BILPOC students are disproportionately placed in prerequisite courses. Further, corequisite support has been shown to universally increase student success for all.
- Set specific goals for and name each student group affected by the policy.
- Explicitly list any practices (e.g., prerequisite remediation) that are no longer allowed or funded.
- Identify funding priorities and allocate funding accordingly for policy implementation. Include the purpose of the funding and the duration the funding will be provided. For example, ensure that funding will be available to support the professional development necessary to shift practice.
 - » If the goal of the policy is to drive institutions to implement a certain reform, add funding incentives—or disincentives for practices that are still allowed but not encouraged. For example, if reforming developmental education is your goal, provide extra funding for institutions that scale corequisite support institution-wide and decrease prerequisite remediation courses after a set period.



Additional considerations for implementation

- Remove potential loopholes in policy language to ensure that the policy is implemented as intended. For example, if the policy is intended to implement corequisite support, be specific that all students must be registered in semester-by-semester academic plans that embed only credit-bearing math and English coursework.
- Consider people, process, and technology in implementation plans:
 - » *People*: Brainstorm who will be affected by the policy so you do not miss any specific details. For example, if testing coordinators will need to revisit processes for a change in placement policy, consider their involvement in policy review.
 - » *Process*: Does the policy require systems change? If so, determine whether elements of the process need to be codified in policy and consider any required modifications to systems.
 - » *Technology*: Does the policy require new technology? If so, indicate the type of technology and the users, along with high-level requirements—but do not get too specific about technology platforms so colleges have the flexibility to find the solution that best meets their needs. Also be sure to consider additional training that may be needed to use the new technology.
- Define the timeline and effective date for policy implementation.
 - » Allow sufficient time for implementation so that college leaders and faculty can understand the new policy and critically discuss, examine, and adjust their practices.

How progress will be reviewed

- Outline accountability measures and how progress will be assessed—and for which students—as well as consequences if targets are not met. For example, Texas set annual milestones for increasing the percentage of eligible developmental education students enrolled in corequisite courses from 25 percent in 2018–19 to 100 percent in 2021–22.
- Build continuous improvement, including data reviews and policy updates, into the policy so it can be adjusted as lessons are learned from implementation and research.





DESIGNING PROGRAMS TO BENEFIT ALL STUDENTS

New Mexico's Opportunity Scholarship is one example of a state program that is designed to benefit students from specific groups—returning adult learners, part-time students, and those pursuing career and technical education certificates—but ultimately benefits all students. Through this program, all full-time and part-time students who are residents of New Mexico and enroll in at least six credit hours at a New Mexico public two- or four-year college are eligible to attend college tuition free. The scholarship is available to returning adult learners and recent high school graduates and can be used for career training certificates, associate degrees, and bachelor's degrees.

The state scholarship is a first-dollar award that covers full tuition and fees. Students who also receive federal financial aid or local or private scholarships can use that money for other needs, such as books, transportation, food, and other college costs.



ADJUSTING POLICY TO MEET STUDENT NEED

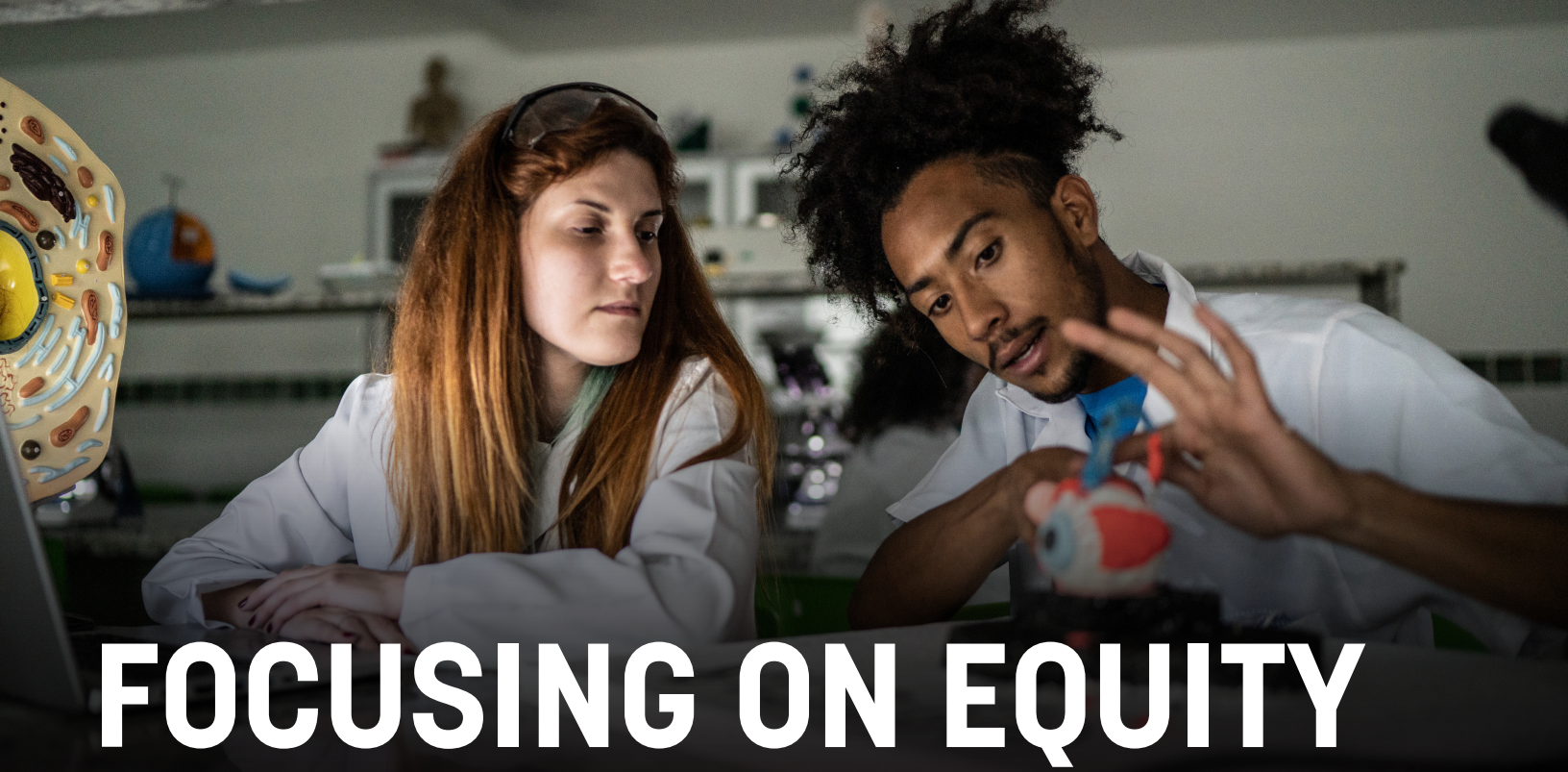
Recognizing that focusing on merit-based aid meant that the students who needed financial support the most were not receiving it, **Utah** ended two popular merit-based scholarships. The state then transferred the resources to the Access Utah Promise Scholarship, Utah's first need-based scholarship. While previously \$2 million went to students with financial need, now \$14 million is going to students from families whose households make less than \$50,000 per year.

Plan for the Rollout

Even the most well-crafted policy will not consistently lead to its intended outcomes if people do not understand why it is important to implement and if its implementation is left open to interpretation. Developing additional materials and using a variety of platforms to roll out and explain the new policy will build buy-in and lead to smoother implementation. Steps to consider include:

- Implementing a statewide communications campaign with ads, social media, op-eds, podcasts, and more to reach a broad audience.
- Creating a comprehensive website for the public so they can understand the policy.
- Holding webinars and making presentations to explain the policy, answer questions, and address concerns. Consider going on a road show to hold sessions at state colleges and universities.
- Collaborating through peer networks such as the CCA Alliance to share lessons learned.
- Organizing convenings to bring stakeholders together to build momentum, review progress, and identify areas for continuous improvement.
- Developing specific materials, such as FAQs and definitions of terms, that can be used across all communications.





FOCUSING ON EQUITY

At CCA, equity is the focus of everything we do. We envision a nation in which postsecondary institutions, policymakers, and systems of higher education welcome, invest in, and support students through and to on-time completion so that every student—regardless of race, ethnicity, socioeconomic status, or familial educational achievement—has equal opportunity to access and complete a college education or credential of value.

Developing equity-driven policy lays the groundwork to close institutional performance gaps and realize this vision. But even the best-crafted policy needs to be followed with strong implementation. In addition to CCA's *No Middle Ground* publication, which shows how colleges can assess practices to identify inequities and address them through our Game Changer strategies, upcoming publications with a strong focus on equity will include:

- A data management guide and toolkit to help colleges identify the best metrics to use to advance their institutional goals and equity agenda;
- A brief on newly available part-time student data, including data showing that historically excluded students are more likely to attend college part time and that part-time students are less likely to complete college;
- A guide to better serving part-time students; and
- A report on student success for learners of color, ages 25 and up.

COMPLETE COLLEGE AMERICA

Complete College America (CCA) builds movements for scaled change and transforms institutions through data-driven policies, student-centered perspectives, and equity-driven practices. Since its founding in 2009, CCA has connected a national network of forward-thinking state and higher education leaders and introduced bold initiatives that help states and institutions confront inequities; close institutional performance gaps; and increase college completion rates, especially for historically excluded students.

USC Race and Equity Center

The University of Southern California is home to a dynamic research, professional learning, and organizational improvement center that serves educational institutions, corporations, government agencies, and other organizations that span a multitude of industries across the United States and in other countries. We actualize our mission through rigorous interdisciplinary research, high-quality professional learning experiences, the production and wide dissemination of useful tools, trustworthy consultations and strategy advising, and substantive partnerships. While race and ethnicity are at the epicenter of our work, we also value their intersectionality with other identities, and therefore aim to advance equity for all persons experiencing marginalization. Our rigorous approach is built on research, scalable and adaptable models of success, and continuous feedback from partners and clients.

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